



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

August 20, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Milestone Contractors, L.P. / 011-17417-00046

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 8/11/03

August 20, 2003

Mr. Ron Terrell
Milestone Contractors, L. P.
5950 South Belmont Avenue, P.O. Box 421459
Indianapolis, Indiana 46242-1459

Re: 011-17417-00046
First Significant Permit Revision to
FESOP 011-10547-00046

Dear Mr. Terrell:

Milestone Contractors, L. P., located at 4312 Whitelick Drive, Whitestone, Indiana was issued a FESOP on December 10, 1999 for a batch mix and drum mix hot asphalt plant. A letter requesting a change in the permit was received on April 2, 2003.

Milestone Contractors, L.P. has submitted a request to add one (1) 20,000 gallon asphalt storage tank.

The addition of the proposed tank will not cause any increases in production or emissions from the existing units.

Therefore, the emissions generated by the proposed modification are the particulate matter (PM), PM10, volatile organic compound (VOC), carbon monoxide (CO) and hazardous air pollutant (HAP) emissions generated by the proposed tank.

Based on the emission estimates performed, the PM, PM10, VOC, CO, single HAP, and combined HAP unrestricted potential to emit (UPTE) are estimated to be 0.01, 0.01, 0.24, 0.02, <10, and 0.01 tons/yr, respectively.

Each pollutant's UPTE is less than its respective 326 IAC 2-8-11.1(d) Minor Permit Revision low end applicable level of 5, 5, 10, 25, 10, and 25 tons per year, there are no new applicable requirements or changes to any existing requirements that occur due to the proposed modification.

However, a new limit is being added to the permit to ensure that the throughput reduction established in Administrative Amendment 011-14387-00046, issued on June 14, 2001, is federally enforceable.

Establishing this limit as federally enforceable limit requires public notification. Since neither an Administrative Amendment nor a Minor Permit Revision require public notification, it is determined that adding the proposed limit cannot be accomplished via these approvals.

Therefore, the proposed modification shall be incorporated into the existing FESOP via a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1) which states changes to an existing source FESOP that are not an Administrative Amendment or a Minor Permit Revision shall be incorporated into the existing source FESOP via a Significant Permit Revision.

In addition, the 40 CFR 60.116b requirements associated with Tanks 22 and F03 shall be amended to correct an error in applicability which incorrectly required the source to comply with the requirements of 40 CFR 60.116b(a), (b), and (d). Only the requirements of 40 CFR 60.116b(a) and (b) apply.

To incorporate the proposed tanks and other proposed changes into the existing FESOP, the following changes shall be made. All added language indicated in bold type. All deleted information is struck-out.

(1) Condition A.2:

Condition A.2 shall be revised as follows to add proposed Tank 27.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) aggregate dryer capable of processing 300 tons per hour of raw material, equipped with one (1) 115 million (MM) British thermal units (Btu) per hour waste oil-fired burner, using natural gas and No. 2 distillate fuel oil as back-up fuels, with one (1) knockout box and one (1) jet pulse baghouse in series for particulate matter (PM) control, exhausting at one (1) stack (ID No. S-1);

.....

- (5) three (3) 22,000 gallon asphalt storage tanks, **identified as** ~~(ID Tanks Nos. 22, 23, and 24);~~,
and **one (1) 20,000 gallon asphalt storage tank, identified as Tank 27; and**

- (6) two (2) 20,000 gallon fuel oil storage tanks (ID Tank Nos. 25 and 26).

(2) New Condition D.1.9:

New Condition D.1.9 shall be added to incorporate the proposed 300 tons per hour production limit.

D.1.9 Asphalt Production Limit

The owner or operator shall limit the total asphalt production to less than or equal to three hundred (300) tons per hour.

All subsequent conditions shall be renumbered accordingly.

(3) Condition D.1.10:

After the public comment period, Milestone Contractors requested a reduction in the fuel use limit of Condition D.1.10 to reduce the allowable SO₂ emissions to a level of 90 tons per year to so that they could request future modifications that result in minor additional emissions without having to go through a significant permit revision each time.

The fuel use limit of existing Condition D.9 (now Condition D.1.10) shall be revised as follows to reflect the new proposed limit of 1,529,102 gallons per year.

D.1.10 Fuel Usage [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), the following limit shall apply:

- (a) the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 115.0 MMBtu per hour burner for the aggregate dryer shall be limited to 1,693,064 **529,102** U.S. gallons per 365 day period, rolled on a daily basis, so that SO₂ emissions are limited ~~below 1090~~ tons per year **or less**.

.....

(4) New Condition D.1.11:

After the public comment period, Milestone Contractors requested a natural gas fuel use limit .1.10 to reduce the allowable NOx emissions to a level of 90 tons per year to so that they could request future modifications that result in minor additional emissions without having to go through a significant permit revision each time.

The fuel use limit of new Condition D.1.11 shall be revised as follows to reflect the new proposed limit of 927 MMcf/yr.

D.1.11 Natural Gas and Equivalent Fuel Use Limit [326 IAC 2-8-4]

The owner or operator shall limit the aggregate dryer combined natural gas and natural gas equivalent usage to 927 million cubic feet (MMcf) per 365 day period, rolled on a daily basis, so that the source NOx emissions are limited to 90 tons per year or less.

This limit will render the 326 IAC 2-7 and 326 IAC 2-2 requirements not applicable.

(5) Condition D.1.17:

Condition D.1.17 was changed to Condition D.1.18 because new Condition D.1.9 was added as part of the original draft. After the public comment period, new Condition D.1.11 was added. Thus, existing Condition D.1.17 is now Condition D.1.19.

Condition D.1.17 (now Condition D.1.19) shall be changed as follows to add the record keeping requirements associated with the new fuel use limit under new Condition D.1.11.

D.1.19 Record Keeping Requirements

- (a) To document compliance with the requirements of Condition D.1.9, the owner or operator shall keep and maintain records of the total amount of asphalt produced per hour.
- (b) To document compliance with Conditions D.1.8 and D.1.10, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual waste oil and waste oil equivalent usage per day since last compliance determination period and equivalent SO₂ emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

 - (4) Fuel supplier certifications.
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(c) To document compliance with the requirements of Condition D.1.11, the owner or operator shall maintain records of the daily natural gas and natural gas equivalent usage.

- (ed) To document compliance with Condition D.1.156, the Permittee shall maintain records of daily visible emission notations of the aggregate dryer baghouse stack exhaust.
- (de) To document compliance with Condition D.1.167, the Permittee shall maintain the following:
- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (ef) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(6) Condition D.1.18:

Existing Condition D.1.18 was changed to Condition D.1.19 because new Condition D.1.9 was added as part of the original draft. After the public comment period new Condition D.1.11 was added. Thus, existing Condition D.1.19 is now Condition D.1.20.

Condition D.1.18 (now Condition D.1.20) shall therefore be changed as follows to add the reporting requirements associated with the new fuel use limit under new Condition D.1.11.

D.1.1920 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions **D.1.910 and D.1.11** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(7) Unit Description of Section D.3:

The unit description of Section D.3 shall be amended as follows to include proposed tank 27.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(5a) three (3) 22,000 gallon asphalt storage tanks, **identified as Tanks (ID Tank Nos. 22, 23, and 24),, and one (1) 20,000 gallon asphalt storage tank, identified as Tank 27.**

(6b) two (2) 20,000 gallon fuel oil storage tanks (ID Tank Nos. 25 and 26).

(8) Condition D.3.4:

Condition D.3.4 shall be removed from the emission limitations and standards section because Condition D.3.4 is not a requirement, limit, or standard.

~~D.3.4 Volatile Organic Compounds (VOCs) [326 IAC 12] [40 CFR 60.110b, Subpart Kb]
Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the three (3) 22,000 gallon asphalt storage tanks and the two (2) 20,000 gallon fuel oil storage tanks, each with a vapor pressure of less than 15.0 kPa, are subject to 40 CFR Part 60.116b, paragraphs (a), (b), and (d) which require record keeping.~~

All subsequent conditions are renumbered accordingly.

(9) Condition D.3.7:

Condition D.3.7 (now Condition D.3.6) shall be amended as follows to remove the 40 CFR 60.116b(d) requirements and to add proposed tank 27.

D.3.7 Record Keeping Requirements

~~(a) To achieve document compliance with the requirements of 40 CFR 60, Subpart Kb, Condition D.3.4, the Permittee shall, for Tanks 22, 23, 24, 25, 26, and 27, keep readily accessible records showing the dimension and capacity of the storage tanks. maintain permanent records at the source in accordance with (1) through (3) below:~~

~~(1) the dimension of each storage vessel;~~

~~(2) an analysis showing the capacity of each storage vessel; and~~

~~(3) the true vapor pressure of each VOC stored, indicating that the maximum true vapor pressure of VOC is less than 15.0 kPa for Tanks 22, 23, 24, 25, and 26.~~

(b) ~~All~~**Said** records shall be maintained in accordance with Section C - General Record Keeping Requirements; of this permit **except that the records shall be kept for the life of the tank.**

(10) New Natural Gas and Natural Gas Equivalent Usage Reporting Form:

A new natural gas and natural gas equivalent usage reporting form shall be added to the permit to provide a form to accommodate the new natural gas and natural gas equivalent limit.

(11) Condition Renumbering:

All conditions shall be renumbered accordingly to reflect the changes to the conditions of Section D.1.

(12) Table of Contents:

The Table of Contents shall be amended to reflect the changes to the conditions of Section D.1.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension 3-5691, or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

cc: File - Boone County
U.S. EPA, Region V
Boone County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Milestone Contractors, L.P.
4312 Whitelick Drive
Whitestown, Indiana 46075**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F011-10547-00046	Date Issued: December 10, 1999
First Minor Permit Revision No.: F011-12854-00046	Date Issued: December 4, 2000
First Administrative Amendment No.: F011-14387-00046	Date Issued: June 14, 2001
First Significant Permit Revision No.: F011-17417-00046	Affected Pages: 2, 3, 4, 5, 6, 7, 28, 29, 30, 31, 32, 35, and 36, with 32a and 41a added
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issued: August 20, 2003

SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permit Conditions

SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Modification [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.19 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]
- B.20 Operational Flexibility [326 IAC 2-8-15]
- B.21 Construction Permit Requirement [326 IAC 2]
- B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)]
- B.23 Transfer of Ownership or Operation [326 IAC 2-8-10]
- B.24 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]
- B.25 Advanced Source Modification Approval [326 IAC 2-8-4(11)]

SECTION C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- C.1 Overall Source Limit [326 IAC 2-8]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]
- C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-8-4(3)]

- C.9 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3]
- C.12 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.17 Monitoring Data Availability
- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS:
Aggregate Dryer, Drum Mixer, and Batch Tower**

General Construction Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.4 Particulate Matter (PM) [326 IAC 12] [40 CFR 60.90, Subpart I]
- D.1.5 Opacity [326 IAC 12] [40 CFR 60.90, Subpart I]
- D.1.6 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]
- D.1.7 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]
- D.1.8 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]
- D.1.9 Asphalt Production Limit
- D.1.10 Fuel Usage [326 IAC 2-8-4]
- D.1.11 Natural Gas and Equivalent Fuel Use Limit [326 IAC 2-8-4]
- D.1.12 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.13 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]
- D.1.14 Sulfur Dioxide Emissions and Sulfur Content
- D.1.15 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.16 Visible Emissions Notations
- D.1.17 Parametric Monitoring
- D.1.18 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.19 Record Keeping Requirements

D.1.20 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Cold-Mix Asphalt Storage Piles

General Construction Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-5-2]

D.2.5 Cold-Mix (Stockpile Mix) Asphalt Concrete Usage [326 IAC 2-8-4]

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

D.2.8 Reporting Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS

Three (3) Asphalt Storage Tanks and two (2) Fuel Oil Storage Tanks

General Construction Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.6 Record Keeping Requirements

Certification Form

Emergency/Deviation Form

Monthly Report Form

Quarterly Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary combination batch mix and drum mix hot asphalt plant.

Authorized Individual:	Ron Terrell
Source Address:	4312 Whitelick Drive, Whitestown, Indiana 46075
Mailing Address:	P.O. Box 421459, Indianapolis, Indiana 46242-1459
Phone Number:	317-788-1040
SIC Code:	2951
County Location:	Boone
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) aggregate dryer capable of processing 300 tons per hour of raw material, equipped with one (1) 115 million (MM) British thermal units (Btu) per hour waste oil-fired burner, using natural gas and No. 2 distillate fuel oil as back-up fuels, with one (1) knockout box and one (1) jet pulse baghouse in series for particulate matter (PM) control, exhausting at one (1) stack (ID No. S-1);
- (2) one (1) asphalt drum mixer capable of processing 300 tons per hour of raw material, with a hydro carbon capture system for hydrocarbon emissions control, exhausting to the aggregate dryer, and one (1) jet pulse baghouse for particulate matter (PM) control, exhausting at one (1) stack (ID No. S-1);
- (3) one (1) batch tower (enclosed portions of the batch plant), processing a maximum of 300 tons per hour of raw material, with fugitive particulate matter emissions from the batch tower controlled by a batch tower fugitive dust capture system which exhausts to the jet pulse baghouse which exhausts at one (1) stack (ID No. S-1). The batch tower consists of the following:
 - (a) one (1) hot elevator;
 - (b) one (1) hot aggregate screen system;
 - (c) five (5) hot aggregate storage bins;
 - (d) one (1) hot aggregate weigh hopper;
 - (e) one (1) 150 gallon hot liquid asphalt weigh bucket; and
 - (f) one (1) pugmill mixer with a maximum hot mix asphalt holding capacity of 12,000 pounds;

- (4) cold-mix (stockpile mix) asphalt storage piles;
- (5) three (3) 22,000 gallon asphalt storage tanks, identified as Tanks 22, 23, and 24, and one (1) 20,000 gallon asphalt storage tank, identified as Tank 27; and
- (6) two (2) 20,000 gallon fuel oil storage tanks (ID Tank Nos. 25 and 26).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million Btu per hour:
 - (a) one (1) 0.5 MMBtu per hour propane-fired hand torch used for maintenance purposes.
- (2) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight:
 - (a) one (1) 0.35 MMBtu per hour No. 2 distillate fuel oil fired portable space heater.
- (3) Combustion source flame safety purging on startup.
- (4) The following VOC and HAP storage containers:
 - (a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (5) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (6) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (used for maintenance purposes).
- (7) Closed loop heating and cooling systems.
- (8) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (9) Paved and unpaved roads and parking lots with public access.
- (10) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (11) One (1) No. 2 distillate oil-fired hot oil heater, with a maximum rated capacity of 2.2 MMBtu per hour, using natural gas as back-up fuel, exhausting through one (1) stack (ID No. S-2).
- (12) One (1) aggregate cold feed system consisting of:
 - (a) six (6) aggregate feed bins;
 - (b) six (6) feeder conveyors;
 - (c) one (1) collector conveyor;
 - (d) one (1) cold aggregate screen system; and
 - (e) one (1) cold aggregate scale conveyor.

- (13) one (1) Reclaimed Asphalt Pavement (RAP) feed system consisting of:
 - (a) one (1) RAP feed bin and one (1) feeder conveyor;
 - (b) one (1) lump breaker system with one (1) access conveyor; and
 - (c) one (1) RAP scale conveyor.
- (14) One (1) hot mix drag slat conveyor with a maximum capacity to transfer 500 tons per hour of hot mix asphalt.
- (15) One (1) hot mix storage system consisting of three (3) hot mix storage silos, each with a maximum storage capacity of 200 tons, with top of silos transfer conveyor systems.
- (16) One (1) dust storage and metering system.
- (17) Aggregate storage piles, with a total maximum storage capacity of 103,470 tons.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (1) one (1) aggregate dryer capable of processing 300 tons per hour of raw material, equipped with one (1) 115 million (MM) British thermal units (Btu) per hour waste oil-fired burner, using natural gas and No. 2 distillate fuel oil as back-up fuels, with one (1) knockout box and one (1) jet pulse baghouse in series for particulate matter (PM) control, exhausting at one (1) stack (ID No. S-1);
- (2) one (1) asphalt drum mixer capable of processing 300 tons per hour of raw material, with a hydro carbon capture system for hydrocarbon emissions control, exhausting to the aggregate dryer, and one (1) jet pulse baghouse for particulate matter (PM) control, exhausting at one (1) stack (ID No. S-1); and
- (3) one (1) batch tower (enclosed portions of the batch plant), processing a maximum of 300 tons per hour of raw material, with fugitive particulate matter emissions from the batch tower controlled by a batch tower fugitive dust capture system which exhausts to the jet pulse baghouse which exhausts at one (1) stack (ID No. S-1). The batch tower consists of the following:
 - (a) one (1) hot elevator;
 - (b) one (1) hot aggregate screen system;
 - (c) five (5) hot aggregate storage bins;
 - (d) one (1) hot aggregate weigh hopper;
 - (e) one (1) 150 gallon hot liquid asphalt weigh bucket; and
 - (f) one (1) pugmill mixer with a maximum hot mix asphalt holding capacity of 12,000 pounds.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions:

General Construction Conditions

- D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions:

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Particulate Matter (PM) [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.90, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the particulate matter emissions from the mixing and drying operations shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 19.4 pounds per hour. This limit will also render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.5 Opacity [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.92, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the mixing and drying operations shall not discharge or cause the discharge into the atmosphere any gases which exhibit 20% opacity or greater.

D.1.6 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart I.

D.1.7 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the aggregate mixing and drying operation shall not exceed 21.98 pounds per hour, including both filterable and condensable fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.8 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 115.0 million Btu per hour burner for the aggregate dryer shall be limited to:

- (a) 1.6 pounds per MMBtu heat input or a sulfur content of less than or equal to 1.5% when using waste oil; and
- (b) 0.5 pounds per million Btu heat input or a sulfur content of less than or equal to 0.5% when using distillate oil.

D.1.9 Asphalt Production Limit

The owner or operator shall limit the total asphalt production to less than or equal to three hundred (300) tons per hour.

D.1.10 Fuel Usage [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), the following limit shall apply:

- (a) the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 115.0 MMBtu per hour burner for the aggregate dryer shall be limited to 1,529,102 U.S. gallons per 365 day period, rolled on a daily basis, so that SO₂ emissions are limited to 90 tons per year or less.
- (b) For purposes of determining compliance, the following shall apply:

- (1) every MMCF of natural gas burned shall be equivalent to 5.4 gallons of waste oil based on SO₂ emissions, such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified; and
- (2) every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of waste oil based on SO₂ emissions and a maximum sulfur content of 0.5 percent such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified.

Therefore, the requirements of 326 IAC 2-7 will not apply.

D.1.11 Natural Gas and Equivalent Fuel Use Limit [326 IAC 2-8-4]

The owner or operator shall limit the aggregate dryer combined natural gas and natural gas equivalent usage to 927 million cubic feet (MMcf) per 365 day period, rolled on a daily basis, so that the source NOx emissions are limited to 90 tons per year or less.

This limit will render the 326 IAC 2-7 and 326 IAC 2-2 requirements not applicable.

D.1.12 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.13 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period no later than 180 days after start-up, the Permittee shall perform PM and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.14 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-3-4, the Permittee shall demonstrate that the waste oil sulfur content does not exceed 0.75% by weight and the No. 2 distillate fuel oil sulfur content does not exceed 0.5% by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 115.0 MMBtu per hour burner for the aggregate dryer, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.1.15 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the aggregate dryer and mixers are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.16 Visible Emissions Notations

- (a) Daily visible emission notations of the aggregate dryer baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.17 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the aggregate mixing and drying operation, at least once daily when the aggregate dryer is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.18 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within twelve (12) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within twelve (12) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.19 Record Keeping Requirements

- (a) To document compliance with the requirements of Condition D.1.9, the owner or operator shall keep and maintain records of the total amount of asphalt produced per hour.
- (b) To document compliance with Conditions D.1.8 and D.1.10, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual waste oil and waste oil equivalent usage per day since last compliance determination period and equivalent SO₂ emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

 - (4) Fuel supplier certifications.
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (c) To document compliance with the requirements of Condition D.1.11, the owner or operator shall maintain records of the daily natural gas and natural gas equivalent usage.

- (d) To document compliance with Condition D.1.16, the Permittee shall maintain records of daily visible emission notations of the aggregate dryer baghouse stack exhaust.
- (e) To document compliance with Condition D.1.17, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.20 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.~~910~~ **D.1.11** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) three (3) 22,000 gallon asphalt storage tanks, identified as Tanks 22, 23, and 24, and one (1) 20,000 gallon asphalt storage tank, identified as Tank 27.
- (b) two (2) 20,000 gallon fuel oil storage tanks (ID Tank Nos. 25 and 26).

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

- D.3.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.3.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.3.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operating Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.3.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.6 Record Keeping Requirements

To achieve compliance with the requirements of 40 CFR 60, Subpart Kb, the Permittee shall, for Tanks 22, 23, 24, 25, 26, and 27, keep readily accessible records showing the dimension and capacity of the storage tanks.

Said records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit except that the records shall be kept for the life of the tank.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Monthly Report

Source Name: Milestone Contractors, L.P.
Source Address: 4312 Whitelick Drive, Whitestown, Indiana 46075
Mailing Address: 5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, Indiana 46242-1459
FESOP No.: F011-10547-00046
Facility: 115 MMBtu/hr burner for the aggregate dryer
Parameter: Oxides of Nitrogen (NOx)
Limit: 927 million cubic feet (MMcf) of natural gas and natural gas equivalent (combined) at the aggregate dryer per 365 day period, rolled on a daily basis, so that the source NOx emissions are limited 90 tons per year or less.

Month: Year:

Day	Fuel Type	Natural Gas and Equivalent Usage This Day (gallons)	Natural Gas and Equivalent Usage Last 364 Days (gallons/day)	365 Day Total Natural Gas and Equivalent Usage (gallons)	Day	Fuel Type	Natural Gas and Equivalent Usage This Day (gallons)	Natural Gas and Equivalent Usage Last 364 Days (gallons/day)	365 Day Total Natural Gas and Equivalent Usage (gallons)
1					17				
2					18				
3					19				
4					20				
5					21				
6					22				
7					23				
8					24				
9					25				
10					26				
11					27				
12					28				
13					29				
14					30				
15					31				
16									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Construction and Operation Status

Source Name: Milestone Contractors, L.P.
Source Location: 4312 Whitelick Drive, Whitestown, Indiana 46075
County: Boone
SIC Code: 2951
Operation Permit No.: 011-10547-00046
Date Issued: December 10, 1999
Significant Permit Revision No.: 011-17417-00046
Permit Reviewer: SDF

On June 25, 2003, the Office of Air Quality (OAQ) had a notice published in the Lebanon Reporter, located in Lebanon, Indiana, stating that Milestone Contractors, L.P. had applied for a permit to construct and operate proposed asphalt storage tank 27. The notice also stated that the OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 10, 2003, Milestone Contractors, L.P. submitted comments on the proposed permit. The comments and the corresponding responses are as follows:

(a) Comment 1:

Milestone disagrees with the calculations of increased emissions from the additional storage of liquid asphalt cement. The equations utilized for this calculation are found in Table 11.1.14 (Silo filling) of AP-42. Silo filling relates to the storage of hot mix asphalt (final product) which has no increased capacity under this revision as the rating of the facility remains at 300 tons per hour. Storage (in tanks) of liquid asphalt cement (raw material) does not correlate with storage (in silos) of hot mix asphalt (final product).

Response 1:

To determine the liquid asphalt storage emissions from the proposed tanks, the compound percentages in Table 11.1-16 were used. Foot note "a" of Table 11.1-16 states that the emission factor for the compounds in Table 11.1-16 is determined by multiplying the percentages presented in Table 11.1-16 by the applicable emission factors for total organic compounds as determined from Table 11.1-14.

Table 11.1-16 lists the compound percentages for silo filling "and" asphalt storage tank emissions and does not provide a means of distinguishing one from the other. The silo filling emission factors from Table 11.1-14 only provide emission factors for silo filling and drum mix or batch mix plant load-out. The drum mix or batch mix plant load-out emission factors do not apply. Therefore, the only option available is the use of the silo filling emission factors.

Since there are no other sources of emission factors and the foot note of Table 11.1-16 only allows use of the applicable emission factors of Table 11.1-14, the only emission factors that can be used are the silo filling emission factors. Further, since AP-42 does not state that the only emission factor applicable to the asphalt storage tanks is TOC, the worst case emissions (total PM, TOC, and CO) had to be used to determine the unrestricted potential to emit.

Therefore, the emission calculations are determined to be correct. No changes will be made.

(b) Comment 2:

Per the potential increase of emissions from the new hot oil heater, Milestone requests a voluntary limit of 90.0 tons of SO₂ and NO_x emissions. This request will reduce the fuel oil and natural gas permit limits. This will also allow future insignificant activities changes under an administrative amendment as opposed to a significant revision.

Response 2:

The limits shall be adjusted as requested.

To reduce the source SO₂ emissions to 90 tons per year, the re-refined oil usage or it's equivalent shall be limited to a rate that is equivalent to 90 tons per year less the SO₂ emissions from the existing unit SO₂ emissions (not including the mixing and drying combustion SO₂ emissions) (5.67 tons/yr). There are no SO₂ emissions associated with the proposed modification.

$$\begin{aligned} X \text{ gal/yr} * 110.3 \text{ lb/1000 gal} * 1/2000 \text{ tons/lb} &= [90.00 \text{ tons/yr} - 5.67 \text{ tons/yr}] \\ &= 84.33 \text{ tons SO}_2\text{/yr} \end{aligned}$$

$$X = 1,529,102 \text{ gallons re-refined oil/yr}$$

The re-refined oil usage limit shall be reduced from 1,693, 061 gallons per year to 1,529,102 gallons per year.

Reducing the fuel use limitation and applying all emission controls will reduce the mixing and drying operation PM, PM₁₀, SO₂, NO_x, VOC, CO, single HAP, and combined HAP emissions to 0.06, 0.05, 84.33, 14.52, 0.76, 3.82, <10, and 13.87 tons per year.

To reduce the source NO_x emissions to 90 tons per year, the natural gas usage or it's equivalent shall be limited to a rate that is equivalent to 90 tons per year less the NO_x emissions from the existing heater emissions (not including the mixing and drying combustion NO_x emissions) (1.93 tons/yr). There are no NO_x emissions associated with the proposed modification.

$$\begin{aligned} X \text{ MMcf/yr} * 190 \text{ lb/MMcf} * 1/2000 \text{ ton/lb} &= [90.00 \text{ tons/yr} - 1.93 \text{ tons/yr}] \\ &= 88.07 \text{ tons/yr} \end{aligned}$$

$$X = 927 \text{ MMcf/yr}$$

Creating a natural gas use limitation and applying all emission controls will reduce the mixing and drying operation combustion PM, PM₁₀, SO₂, NO_x, VOC, CO, single HAP, and combined HAP emissions to neg., neg., 0.28, 88.07, 2.55, 38.93, <10, and 12.48 tons per year.

The worst case emissions from the mixing and drying operations after application of the limits is listed below.

Unit	PM (tons/yr)	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	NO _x (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Re-refined Oil	0.06	0.05	84.33	14.52	0.76	3.82	<10	13.87
Natural Gas	neg.	neg.	0.28	88.07	2.55	38.93	<10	12.48

The source emissions after application of the proposed limitations are listed below.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Mix and Dry Combustion	0.06	0.05	84.33	88.07	2.55	38.93	<10	13.87
Other Source Emissions	5.69	2.74	5.67	1.93	73.27	0.91	<10	neg.
Proposed Modification	0.01	0.01	-	-	0.24	0.02	<10	neg.
Source	5.76	2.80	90.00	90.00	76.06	39.86	<10	13.87

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The source, after construction and operation of the proposed modification and implementation of the new fuel use limits, is still not a major PSD stationary source because no criteria pollutant emissions are greater than the applicable level or 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This source, after construction and operation of the proposed modification and implementation of the new fuel use limits, is still not a Part 70 major stationary source because no criteria pollutants exceed the applicable level of 100 tons per year and the single and combined HAP emissions are less than the respective applicable levels of 10 and 25 tons per year.

(c) Comment 3:

Per proposed change to Condition D.1.18(a), Milestone production equipment currently records a daily running total tonnage and a daily running production time. From this Milestone currently keeps and maintains records of the total asphalt produced each day and the total time of production. This data would provide an hourly average of asphalt produced. Milestone proposes using this data to comply with new Condition D.1.9. Milestone utilizes a daily hourly average as documentation to IDEM when the facility was derated to 300 tons per hour in Administrative Amendment F011-14387-00046.

Response 3:

Milestone Contractors, under Administrative Amendment 011-14387-00046, issued on June 14, 2001, requested derating the throughput capacity of the asphalt plant from the maximum rate of 450 tons per hour to 300 tons per hour because the process could only achieve compliance with the limits established in the permit (via the compliance stack tests) by operating at a level of 300 tons per year.

To successfully derate the throughput to a level that achieves compliance with the limit and stack testing requirements requires a federally enforceable limit. The limit established is the limit of Condition D.1.9, a straight hourly limit of 300 tons per hour. This limit, as written, does not allow the hourly throughput to exceed 300 tons per hour at any time.

Milestone Contractors has proposed utilizing a daily hourly average to demonstrate compliance with the limit. Utilizing a daily average creates a problem in demonstrating compliance with the straight hourly limit because under a daily average, the hourly throughput could exceed 300 tons per hour and average out to a hourly level of 300 tons per hour.

To address this problem, Milestone Contractors further proposed use of the daily hourly average with a certification from the owner or operator stating that the hourly production will never exceed 300 tons per hour.

Upon review of this latest proposal, the Office of Air Quality has determined that the daily average with the certification still does not adequately demonstrate compliance with the throughput limit.

Thus, the requirement to keep records of the hourly throughput shall remain the same.

To incorporate the proposed limit changes into the existing source permit, the following changes shall be made. All addition language is indicated in bold type All deleted information is struck-out.

(1) Condition D.1.10:

Condition D.1.10 shall be amended as follows to revise the re-refined oil usage limit from 1,693,061 gallons per 365 day period to 1,529,102 gallons per 365 day period.

D.1.10 Fuel Usage [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), the following limit shall apply:

- (a) the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 115.0 MMBtu per hour burner for the aggregate dryer shall be limited to **1,693,061**~~529,102~~ U.S. gallons per 365 day period, rolled on a daily basis, so that SO₂ emissions are limited ~~below 1090~~ tons per year **or less**.

.....

(2) New Condition D.1.11:

New Condition D.1.11 shall be added to include the new natural gas fuel use limit of 927 MMcf/yr.

D.1.11 Natural Gas and Equivalent Fuel Use Limit [326 IAC 2-8-4]

The owner or operator shall limit the aggregate dryer combined natural gas and natural gas equivalent usage to 927 million cubic feet (MMcf) per 365 day period, rolled on a daily basis, so that the source NOx emissions are limited to 90 tons per year or less.

This limit will render the 326 IAC 2-7 and 326 IAC 2-2 requirements not applicable.

(3) Condition D.1.18:

Condition D.1.18 (now Condition D.1.19) shall be amended as follows to add the record keeping requirements associated with the new natural gas fuel use limit.

D.1.19 Record Keeping Requirements

- (a) To document compliance with the requirements of Condition D.1.9, the owner or operator shall keep and maintain records of the total amount of asphalt produced per hour.
- (b) To document compliance with Conditions D.1.8 and D.1.10, the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Calendar dates covered in the compliance determination period;

- (2) Actual waste oil and waste oil equivalent usage per day since last compliance determination period and equivalent SO₂ emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(c) To document compliance with the requirements of Condition D.1.11, the owner or operator shall maintain records of the daily natural gas and natural gas equivalent usage.

- (ed) To document compliance with Condition D.1.156, the Permittee shall maintain records of daily visible emission notations of the aggregate dryer baghouse stack exhaust.
- (de) To document compliance with Condition D.1.167, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (ef) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(4) Condition D.1.19:

Condition D.1.19 (now Condition D.1.20) shall be amended as follows to include the reporting requirements associated with the new natural gas and natural gas equivalent usage limit.

D.1.1920 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions **D.1.910 and D.1.11** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(5) New Natural Gas and Natural Gas Equivalent Usage Reporting Form:

A new natural gas and natural gas equivalent usage reporting form shall be added to the permit to provide a form to accommodate the new natural gas and natural gas equivalent limit.

(6) Condition Renumbering:

All conditions after the new conditions shall be renumbered accordingly.

(7) Table of Contents:

The Table of Contents shall be amended to reflect the changes to the conditions of Section D.1.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	Milestone Contractors, L.P.
Source Location:	4312 Whitelick Drive, Whitestown, Indiana 46075
County:	Boone
SIC Code:	2951
Operation Permit No.:	011-10547-00046
Date Issued:	December 10, 1999
Significant Permit Revision No.:	011-17417-00046
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Milestone Contractors, L.P. relating to the operation of their stationary combination batch mix and drum mix hot asphalt plant.

Request

On April 2, 2003, Milestone Contractors, L.P. submitted a request to add one (1) 20,000 gallon horizontal liquid asphalt storage tank, to be identified as Tank 27.

The addition of the proposed tank will not cause any increases in production or emissions from the existing units.

Therefore, the emissions generated by the proposed modification are the particulate matter (PM), PM₁₀, volatile organic compound (VOC), carbon monoxide (CO) and hazardous air pollutant (HAP) emissions generated by the proposed tank.

Based on the emission estimates performed, the PM, PM₁₀, VOC, CO, single HAP, and combined HAP unrestricted potential to emit (UPTE) are estimated to be 0.01, 0.01, 0.24, 0.02, <10, and 0.01 tons/yr, respectively.

Each pollutant's UPTE is less than its respective 326 IAC 2-8-11.1(d) Minor Permit Revision low end applicable level of 5, 5, 10, 25, 10, and 25 tons per year, there are no new applicable requirements or changes to any existing requirements that occur due to the proposed modification.

However, a new limit is being added to the permit to ensure that the throughput reduction established in Administrative Amendment 011-14387-00046, issued on June 14, 2001, is federally enforceable.

Establishing this limit as federally enforceable limit requires public notification. Since neither an Administrative Amendment nor a Minor Permit Revision require public notification, it is determined that adding the proposed limit cannot be accomplished via these approvals.

Therefore, the proposed modification shall be incorporated into the existing FESOP via a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1) which states changes to an existing source FESOP that are not an Administrative Amendment or a Minor Permit Revision shall be incorporated into the existing source FESOP via a Significant Permit Revision.

Existing Approvals

The source has been operating under FESOP 011-10547-00046, issued on December 10, 1999, First Minor Permit Revision 011-12854-00046, issued on December 4, 2000, and First Administrative Amendment 011-14387-00046, issued on June 14, 2001.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on information obtained from the permit application.

Emission Calculations

The emissions generated by the proposed modification are the proposed tank PM, PM10, VOC, CO, and HAP emissions. The following calculations determine the unrestricted potential to emit (UPTE) and emissions after controls due to the modification.

(1) Unrestricted Potential to Emit (UPTE):

The emissions are determined utilizing AP-42 emission factors which are based on a lb/ton basis. Therefore, before determining the emissions, it is necessary to determine the fraction increase in capacity, the maximum amount liquid asphalt produced per hour, and the maximum amount of liquid asphalt produced per hour that will be moved through the proposed tank.

Fraction Increase In Capacity:

The current liquid asphalt storage capacity at Milestone is 66,000 gallons. Milestone is proposing to add one (1) 20,000 gallon storage tank. Therefore, the new storage capacity will be 86,000 gallons.

$66,000 \text{ gallons} + 20,000 \text{ gallons} = 86,000 \text{ gallons}$.

The fraction increase in capacity is estimated to be 0.23.

$20,000 \text{ gallons} / 86,000 \text{ gallons} = 0.23$

Maximum Amount of Liquid Asphalt Produced Per Hour:

The maximum amount of asphalt that can be produced is 300 tons per hour. AP-42 states that 8% of asphalt produced is liquid asphalt. Therefore, the maximum amount of liquid asphalt produced per hour is 24 tons/hr.

$300 \text{ tons/hr} * 0.08 = 24 \text{ tons/hr}$

Maximum Amount of Liquid Asphalt Produced Per Hour That Will Be Moved Through the Proposed Tank:

The maximum amount of liquid asphalt produced per hour that will be moved through the proposed tank is the product of the estimated maximum amount of liquid asphalt produced per hour and the fraction increase in storage capacity, or 5.52 tons per hour.

$24 \text{ tons/hr} * 0.23 = 5.52 \text{ tons/hr}$

(a) PM(PM10):

The following calculations determine the PM(PM10) UPTE based on filling and storage emissions, a maximum amount of liquid asphalt of 5.52 tons/hr, AP-42 methodologies, emissions before controls, and 8760 hours of operation.

$$\begin{aligned} \text{Ef: } & 0.000332 + 0.00105 * (-V) * e((0.0251) * (T + 460) - 20.43) = \\ & 0.000332 + 0.00105 * (-(-0.5)) * e((0.0251) * (325 + 460) - 20.43) = 0.0006 \text{ lb/ton} \end{aligned}$$

where: Ef = emission factor (lb/ton)
V = default asphalt volatility (-0.5)
T = default temperature (325)

$$5.52 \text{ tons/hr} * 0.0006 \text{ lb PM/ton} * 1/2000 \text{ ton PM/lb PM} * 8760 \text{ hr/yr} = 0.01 \text{ tons/yr}$$

PM10 is determined to be equal to PM in this case.

(b) VOC:

The following calculations determine the VOC UPTE based on filling and storage emissions, a maximum amount of liquid asphalt of 5.52 tons/hr, AP-42 methodologies, emissions before controls, and 8760 hours of operation.

$$\begin{aligned} \text{Ef: } & 0.0504 * (-V) * e((0.0251) * (T + 460) - 20.43) = \\ & 0.0504 * (-(-0.5)) * e((0.0251) * (325 + 460) - 20.43) = 0.01 \text{ lb/ton} \end{aligned}$$

where: Ef = emission factor (lb/ton)
V = default asphalt volatility (-0.5)
T = default temperature (325)

$$5.52 \text{ tons/hr} * 0.01 \text{ lb VOC/ton} * 1/2000 \text{ ton VOC/lb VOC} * 8760 \text{ hr/yr} = 0.24 \text{ tons/yr}$$

(c) CO:

The following calculations determine the CO UPTE based on filling and storage emissions, a maximum amount of liquid asphalt of 5.52 tons/hr, AP-42 methodologies, emissions before controls, and 8760 hours of operation.

$$\begin{aligned} \text{Ef: } & 0.00488 * (-V) * e((0.0251) * (T + 460) - 20.43) = \\ & 0.00488 * (-(-0.5)) * e((0.0251) * (325 + 460) - 20.43) = 0.001 \text{ lb/ton} \end{aligned}$$

where: Ef = emission factor (lb/ton)
V = default asphalt volatility (-0.5)
T = default temperature (325)

$$5.52 \text{ tons/hr} * 0.001 \text{ lb CO/ton} * 1/2000 \text{ ton CO/lb CO} * 8760 \text{ hr/yr} = 0.02 \text{ tons/yr}$$

(d) Combined HAPs:

AP-42 states that the combined HAP emissions are 2.8% of the VOC emissions. The combined HAP emissions based on the AP-42 fraction of 2.8% is estimated to be 0.01 tons/yr.

$$0.028 * 0.24 \text{ tons/yr} = 0.01 \text{ tons/yr}$$

(2) Emissions After Controls:

All applicable emissions are uncontrolled.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.01
PM-10	0.01
SO ₂	-
VOC	0.24
CO	0.02
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Combined HAPs	0.01

Each pollutant's UPTE is less than its respective 326 IAC 2-8-11.1(d) Minor Permit Revision low end applicable level of 5, 5, 10, 25, 10, and 25 tons per year, there are no new applicable requirements or changes to any existing requirements that occur due to the proposed modification.

However, a new limit is being added to the permit to ensure that the throughput reduction established in Administrative Amendment 011-14387-00046, issued on June 14, 2001, is federally enforceable.

Establishing this limit as federally enforceable limit requires public notification. Since neither an Administrative Amendment nor a Minor Permit Revision require public notification, it is determined that adding the proposed limit cannot be accomplished via these approvals.

Therefore, the proposed modification shall be incorporated into the existing FESOP via a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1) which states changes to an existing source FESOP that are not an Administrative Amendment or a Minor Permit Revision shall be incorporated into the existing source FESOP via a Significant Permit Revision.

County Attainment Status

The source is located in Boone County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Boone County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.
- (b) Boone County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited), as obtained from FESOP 011-10547-00046, issued on December 12, 1999:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source*	90.63	99.00	99.00	97.63	99.00	43.22	<10	22.96

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- * On May 22, 2001, Milestone Contractors, LP submitted an application to reduce the source asphalt production rate from 450 to 300 tons per hour due to the fact that after commencement of operation of the source, it was determined that compliance with the applicable requirements of the FESOP would be difficult to achieve if the source operated at a maximum capacity of 450 tons per hour.

The stack testing that was performed, demonstrated that compliance with all applicable requirements is achieved when operating at a maximum production rate of 300 tons per hour. Thus, Milestone Contractors, submitted a request to reduce the source production rate to 300 tons per hour.

To incorporate the proposed change in production, Administrative Amendment 011-14387-00046 was drafted. Under this approval, the unit descriptions of Sections A and D.1 were changed, but no other changes were made.

Unit descriptions are not federally enforceable. Therefore, since:

- (a) there are no limits requiring the lower production rate,
- (b) there are no changes to the existing permit conditions that result in a reduction in emissions, and
- (c) there have been no changes to the existing equipment that physically limit the production or emissions,

it is determined that:

- (a) the PTE for the existing source is the most recent PTE (PTE based on 450 tons per hour), and
- (b) the desired reduction has not been realized.

Thus, it is determined that the existing source PTE, for the purposes of this review, is the PTE based on 450 tons per hour established in FESOP 011-10547-00046 and that additional changes to the permit are necessary to validate the production rate reduction proposed under Administrative Amendment 011-14387-00046.

To ensure that the desired emission reductions are realized, a 300 tons/hr production limit and a requirement to keep records of the hourly production rate shall be established. The production limit is necessary to establish a federally enforceable limit. The recordkeeping requirement will demonstrate compliance with the limit on a more or less continuous basis by providing, on demand, documentation of the production rate.

No reporting requirements shall be established because the proposed production limit is a short term limit established to achieve compliance with the source short term 0.04 gr/dscf limit under 40 CFR 60, Subpart I.

Compliance with the production rate limit shall be documented annually by stating in the annual certification that compliance with the production limit is achieved.

These proposed changes shall be incorporated into the permit accordingly.

- (a) The mixing and drying operation PM emissions were limited in FESOP 011-10547-00046, to 0.04 gr/dscf (19.4 pounds per hour) which, combined with the other existing limitations and standards, limited the source PM emissions to 90.63 tons per year.
- (b) The mixing and drying operation PM10 emissions were limited in FESOP 011-10547-00046, to 21.98 pounds per hour which, combined with the other existing limitations and standards, limited the source PM10 emissions to 99.00 tons/yr.
- (c) In FESOP 011-10547-00046, the re-refined oil fuel use for the aggregate dryer burner was limited to 1,693,061 gallons or it's equivalent which, combined with the other existing limitations and standards, limited the source SO2 emissions to 99.00 tons/yr.
- (d) In FESOP 011-10547-00046, the amount of cold mix asphalt that can be produced was limited to 73.2 tons per year which, combined with the other existing limitations and standards, limited the source VOC emissions to 99.00 tons per year.
- (e) The existing source is not a major PSD stationary source because no criteria pollutant emissions are greater than the applicable level or 250 tons per year or more and it is not one of the 28 listed source categories.

- (f) This source is not a Part 70 major stationary source because no criteria pollutants exceed the applicable level of 100 tons per year and the single and combined HAP emissions are less than the respective applicable levels of 10 and 25 tons per year.

Emissions After the Modification

Emissions after the modification and the proposed production limit of 300 tons per hour, based on emissions after controls and 8760 hours of operation per year at rated capacity, and after implementation of all applicable limits or standards:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Existing Source	57.46	8.29	98.99	97.63	91.34	43.22	<10	15.27
Modification	0.01	0.01	-	-	0.24	0.02	<10	0.01
	57.47	8.30	98.99	97.63	91.58	43.24	<10	15.28

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The source after the proposed modification is still not a major PSD stationary source because no criteria pollutant emissions are greater than the applicable level of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This source after the proposed modification is still not a Part 70 major stationary source because no criteria pollutants exceed the applicable level of 100 tons per year and the single and combined HAP emissions are less than the respective applicable levels of 10 and 25 tons per year.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS):

- (1) This source is still subject to New Source Performance Standard, 40 CFR 60, Subpart I. The proposed tank will have no impact on the current requirements.
- (2) Tanks 22, 23, 24, 25, and 26, are still subject to 40 CFR 60, Subpart Kb. The proposed tank will have no impact on the rule applicability.

However, upon review of the Technical Support Document (TSD) for FESOP 011-10547-00046, it was determined that there was an error made in the applicability determination.

The TSD states that since the tanks each were constructed after the applicable date of July 23, 1984, have a capacity greater than the 6.110b(a) applicable level of 40 cubic meters, and have a capacity greater than or equal to 75 cubic meters but less than 150 cubic meters and a true vapor pressure less than 15 kilopascals, the requirements of 40 CFR 60.116b(a), (b), and (d) apply.

However, pursuant to 40 CFR 60.110b(c), each tank with a capacity greater than or equal to 75 cubic meters but less than 150 cubic meters with a true vapor pressure less than 15 kilopascals, is only subject to paragraphs (a) and (b) of 40 CFR 60.116b. Tanks 22, 23, 24, 25, and 26 should have only been subject to 40 CFR 60.116b(a) and (b).

Therefore, the applicable requirements in the permit shall be changed appropriately.

- (3) Proposed storage tank 27 is not subject to the requirements of 40 CFR 60, Subpart K, "Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978" because the tank will be constructed after the applicable date of May 19, 1978.
- (4) Proposed storage tank 27 is not subject to the requirements of 40 CFR 60, Subpart Ka, "Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984" because the tank will be constructed after the applicable date of July 23, 1984.
- (5) Proposed storage tank 27 is subject to the requirements of 40 CFR 60, Subpart Kb, "Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984" because the tank's capacity (20,000 gallons) is less than the applicable level of 10,567 gallons (40 cubic meters).

Pursuant to 40 CFR 60.110b(c), each tank with a capacity greater than or equal to 75 cubic meters (19,813 gallons) but less than 151 cubic meters (39,890 gallons) with a true vapor pressure less than 15 kilopascals, is only subject to paragraphs (a) and (b) of 40 CFR 60.116b.

The tank capacity (20,000 gallons) falls within the 40 CFR 60.110b(c) applicable range of 75 cubic meters (19,813 gallons) and 151 cubic meters (39,890 gallons) and the true vapor pressure (1.3 E-8 kPa) is less than the 40 CFR 60.110b(c) applicable level of 15 kPa. Therefore, only Paragraphs (a) and (b) of 60.116b apply.

Pursuant to 40 CFR 60.116b(a) and (b), the owner or operator shall, for Tank 27, keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

Said records shall be kept for the life of the tank.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this source.

State Rule Applicability

(a) Entire State Rule Applicability:

(1) 326 IAC 2-2 (Prevention of Significant Deterioration)

The 326 IAC 2-2 Prevention of Significant Deterioration (PSD) requirements do not apply because no source criteria pollutant emissions exceed the applicable level of 250 tons per year and the source is not one of the 28 listed source categories.

(2) 326 IAC 2-6 (Emission Reporting):

The emission reporting requirements of 326 IAC 2-6 still do not apply because the source VOC emissions (99 tons per year) are less than the Boone County applicable level of 100 tons per year.

(3) 326 IAC 2-8 (FESOP):

The existing limits that prevent the source from being a Part 70 major source under 326 IAC 2-7 still apply because the proposed tank will not affect the status of these limits.

(4) 326 IAC 2-8-4(9) (Preventive Maintenance Plan)

The 326 IAC 2-8-4(9) preventive maintenance plan requirements still apply. The proposed tank will not affect the status of these requirements.

(5) 326 IAC 4-1 (Open Burning):

The requirements of 326 IAC 4-1 still apply. The proposed tank will not affect the status of these requirements.

(6) 326 IAC 4-2 (Incineration):

The requirements of 326 IAC 4-2 still apply. The proposed tank will not affect the status of these requirements.

(7) 326 IAC 5-1 (Visible Opacity Limitations):

The requirements of 326 IAC 5-1 still apply. The proposed tank will not affect the status of these requirements.

(8) 326 IAC 6-4 (Fugitive Dust Emissions):

The fugitive dust requirements of 326 IAC 6-4 still apply. The proposed tank will not affect the status of these requirements.

(9) 326 IAC 6-5 (Fugitive PM Emissions):

The fugitive PM emission requirements of 326 IAC 6-5 still apply. The proposed tank will not affect the status of these requirements.

(b) Individual Unit Sate Rules, Proposed Liquid Asphalt Storage Tank:

(1) 326 IAC 2-4.1 (New Source Toxics Control)

The requirements of 326 IAC 2-4.1-1 do not apply to the proposed modification because the single and combined HAP emissions are less than the respective applicable levels of 10 and 25 tons per year.

(2) 326 IAC 8-4-3:

The requirements of 326 IAC 8-4-3 do not apply to proposed Tank 27 because the tank's capacity (20,000 gallons) is less than the applicable capacity of 39,000 gallons.

(3) 326 IAC 8-9:

The requirements of 326 IAC 8-9 do not apply to proposed Tank 27 because the source is not located in any of the applicable counties (Lake, Porter, Clark, or Floyd).

(4) 326 IAC 8-1-6:

Although there are no other Article 8 rules that apply, the requirements of 326 IAC 8-1-6 do not apply to proposed Tank 27 because the VOC unrestricted potential to emit (UPTE), 0.24 tons per year, is less than the applicable level of 25 tons per year.

Changes to the Permit

The following lists the changes to the existing permit that are necessary to incorporate the proposed tank and other changes. All added language indicated in bold type. All deleted information is struck-out.

(1) Condition A.2:

Condition A.2 shall be revised as follows to add proposed Tank 27.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) aggregate dryer capable of processing 300 tons per hour of raw material, equipped with one (1) 115 million (MM) British thermal units (Btu) per hour waste oil-fired burner, using natural gas and No. 2 distillate fuel oil as back-up fuels, with one (1) knockout box and one (1) jet pulse baghouse in series for particulate matter (PM) control, exhausting at one (1) stack (ID No. S-1);

.....

- (5) three (3) 22,000 gallon asphalt storage tanks, **identified as** ~~(ID Tanks Nos. 22, 23, and 24);~~, and **one (1) 20,000 gallon asphalt storage tank, identified as Tank 27; and**

- (6) two (2) 20,000 gallon fuel oil storage tanks (ID Tank Nos. 25 and 26).

(2) New Condition D.1.9:

New Condition D.1.9 shall be added to incorporate the proposed 300 tons per hour production limit.

D.1.9 Asphalt Production Limit

The owner or operator shall limit the total asphalt production to less than or equal to three hundred (300) tons per hour.

All subsequent conditions shall be renumbered accordingly.

(3) Condition D.1.17:

Condition D.1.17 (now Condition D.1.18) shall be changed as follows to add the record keeping requirements associated with the new production limit under new Condition D.1.9.

D.1.178 Record Keeping Requirements

(a) To document compliance with the requirements of Condition D.1.9, the owner or operator shall keep and maintain records of the total amount of asphalt produced each hour.

(ab) To document compliance with Conditions D.1.8 and D.1.9~~10~~, the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual waste oil and waste oil equivalent usage per day since last compliance determination period and equivalent SO₂ emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(bc) To document compliance with Condition D.1.14~~5~~, the Permittee shall maintain records of daily visible emission notations of the aggregate dryer baghouse stack exhaust.

(ed) To document compliance with Condition D.1.15~~6~~, the Permittee shall maintain the following:

- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure.
- (2) Documentation of all response steps implemented, per event .
- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
- (4) Quality Assurance/Quality Control (QA/QC) procedures.

- (5) Operator standard operating procedures (SOP).
- (6) Manufacturer's specifications or its equivalent.
- (7) Equipment "troubleshooting" contingency plan.
- (de) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(4) Condition D.1.18:

Condition D.1.18 (now Condition D.1.19) shall be changed as follows to change the Condition reference from Condition D.1.9 to Condition D.1.10.

D.1.189 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.9~~10~~ shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(5) Unit Description of Section D.3:

The unit description of Section D.3 shall be amended as follows to include proposed tank 27.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(5a) three (3) 22,000 gallon asphalt storage tanks, **identified as Tanks (ID Tank Nos. 22, 23, and 24);**, and **one (1) 20,000 gallon asphalt storage tank, identified as Tank 27.**

(6b) two (2) 20,000 gallon fuel oil storage tanks (ID Tank Nos. 25 and 26).

(6) Condition D.3.4:

Condition D.3.4 shall be removed from the emission limitations and standards section because Condition D.3.4 is not a requirement, limit, or standard.

~~D.3.4 Volatile Organic Compounds (VOCs) [326 IAC 12] [40 CFR 60.110b, Subpart Kb]
Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the three (3) 22,000 gallon asphalt storage tanks and the two (2) 20,000 gallon fuel oil storage tanks, each with a vapor pressure of less than 15.0 kPa, are subject to 40 CFR Part 60.116b, paragraphs (a), (b), and (d) which require record keeping.~~

All subsequent conditions are renumbered accordingly.

(7) Condition D.3.7:

Condition D.3.7 (now Condition D.3.6) shall be amended as follows to remove the 40 CFR 60.116b(d) requirements and to add proposed tank 27.

D.3.7 Record Keeping Requirements

(a) To ~~achieve document~~ compliance with **the requirements of 40 CFR 60, Subpart Kb, Condition D.3.4**, the Permittee shall, **for Tanks 22, 23, 24, 25, 26, and 27, keep readily accessible records showing the dimension and capacity of the storage tanks.** ~~maintain permanent records at the source in accordance with (1) through (3) below:~~

~~(1) the dimension of each storage vessel;~~

~~(2) an analysis showing the capacity of each storage vessel; and~~

~~(3) the true vapor pressure of each VOC stored, indicating that the maximum true vapor pressure of VOC is less than 15.0 kPa for Tanks 22, 23, 24, 25, and 26.~~

(b) ~~All~~**Said** records shall be maintained in accordance with Section C - General Record Keeping Requirements; of this permit **except that the records shall be kept for the life of the tank.**

(8) Table of Contents:

The Table of Contents shall be amended to reflect the changes in condition numbering.

Conclusion

The proposed tank shall be constructed and operated according to the provisions of the existing permit, Significant Permit revision 011-17417-00046, and all other existing source approvals.